



Kaufman Dolowich & Voluck, LLP
40 Exchange Place, 20th Floor
New York, New York 10005
Telephone: 212.485.9600
Facsimile: 212.485.9700
www.kdvlaw.com

Kevin J. Windels
Email: KWindels@kdvlaw.com

January 3, 2022

Via ECF

Hon. Margo K. Brodie
Chief District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *State Farm Mutual Automobile Ins. Co., et al. v. Metro Pain Specialists, et al,*
Civil Case No. 1:21-cv-05523 (MKB) (PK)

Dear Judge Brodie:

Our firm represents Defendants Metro Pain Specialists P.C. d/b/a Metro Pain Specialists (“Metro Pain”), Leonid Shapiro, M.D. (“Dr. Shapiro”) and Tri-Borough NY Medical Practice P.C. in the above-captioned matter. We are writing to Your Honor as a follow-up to our letter of December 29, 2021 (Doc. No. 89) ur Honor in which we wrote to the Court to request a brief adjournment of the return date of Plaintiffs’ Motion for Preliminary Injunction until Tuesday January 17th from the current return date set by the Court which is January 4, 2022 (Doc. No. 77).

We are requesting the extension because the two principal attorneys handling this matter for our firm, Peter Stroili and myself, were on vacation during the Christmas and New Year’s holidays and returned to the office earlier today. We note that the motion was served by Plaintiffs on December 23rd, the day before Christmas Eve. Once we were advised of the briefing schedule set by the Court (on December 27th), only allowing for six business days to draft opposition to a complex motion that could have a severe effect on our clients’ financial wellbeing, we immediately contacted Plaintiffs’ counsel and requested that they consent to an adjournment of the briefing schedule set by the Court.

In accordance with paragraph 1. F. of Your Honor’s Rules, we note that counsel for the Plaintiffs have consented to the adjournment of the time for all Defendants to respond to the Motion and no previous requests for adjournment or enlargement of time have been requested other than the request made in our December 29th letter.

We appreciate the Court's consideration of this request.

Very truly yours,

Kaufman Dolowich & Voluck, LLP

By: /s/ *Kevin J. Windels*
Kevin J. Windels

cc: All counsel of record (via ECF)